

US EPA ARCHIVE DOCUMENT

EPA Workshop for Environmental Justice Communities on the Clean Power Plan

Introduction to the Public Commenting Process

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Why is the public comment process valuable?

- The public comment process results in the engagement of environmental justice communities that are being negatively impacted by power plants in the areas where they live and/or work.
- If the impacted communities are not involved in the public comment process, submittal of comments and speaking up, their health and quality of life will continue to be negatively impacted and the environmental and health regulatory agencies will not be aware of the negative impacts.
- Environmental Justice community involvement in the public comment process for the Clean Power Plan, is also critical to insuring future involvement on the part of the EJ communities as the Clean Power Plan is implemented by power plants in their area and overseen by state and federal environmental agencies.

- In Louisiana and Texas, a large number of the heavy industrial facilities have their own electric generating units. The air emissions from these facilities add to the pollution burdens of fence line EJ communities.
- Participating in the public comment process is extremely important for those communities. The Clean Power Plan can result in reductions of pollution burdens being released by some of the industrial facilities and improve the quality of life in fence line communities as well as communities a greater distance from the power plant/industrial facilities.

- It is not enough to merely submit comments. You must continue to track the process as the Clean Power Plan is implemented by the facility or facilities in your area.
- Complaining after the fact is not as valuable as submitting your issues during the public comment period. The EPA needs to hear from you during the public comment period.



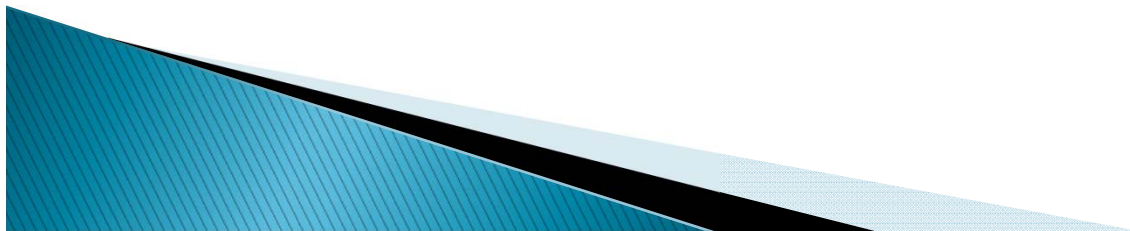
How can communities influence the content of the proposed Federal Plan?

- Community members can provide information on the impacts power plants are having on your community.
- Focus on what the community would like to see addressed in the plan to improve their health and quality of life in their communities.
- Review environmental agency files on power plants in your area to obtain information on the results of agency inspections, compliance orders, accidental release, upset conditions and air permit compliance records. Use that information to prepare comments to address specific situations that have occurred at power plants.
- Engage in dialog with the state environmental agency to determine if the agency is going to use the Federal Plan or adopt their own plan. Also determine the approaches the environmental agency will use to reduce CO₂ emissions.

- Meet with the company operating the power plant impacting your community to obtain information on how the plant will address the Clean Power Plan and reduction of CO2 emissions.
- The information from the environmental agencies and power companies will help you prepare appropriate community based comments to influence the content of the proposed Federal Plan.
- Remember, the state environmental agencies, electric power companies, oil and gas industrial trade groups (they provide fuel to the electric generating plants), coal industry trade groups, national business organizations will all weigh in on the proposed Federal Plan.
- Community members must be heard in order for their issues and concerns to be addressed. Silence is not golden. Silence results in community issues being overlooked and drowned out by business and industry concerns.

How can communities develop effective written and oral public comments?


- Organize meetings for communities living and working around power plants.
- Focus on power plants that burn coal, lignite, industrial coke and natural gas.
- Consider stand alone power plants as well as power plants at industrial facilities.
- Have meetings to identify issues and concerns that community members have.
- Identify where and how emissions have impacted your community that correspond to emissions reductions to be addressed in the Clean Power Plan.



- Compile and present information on the Clean Power Plan and Federal Plan, in terms communities can deal with.
- Discuss the approach the state will take to address the requirements.
- Compile the negative human health impacts and environmental impacts the closest power plant is having on the community.
- Prepare written comments with community based documented examples and associated community negative impacts.
- Condense you written comments into a short verbal presentations and hand in your complete comment documents.

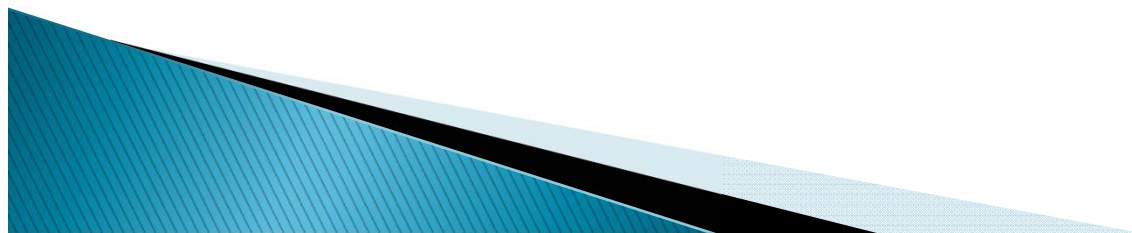


What should commenter's expect to happen after they submit a comment?

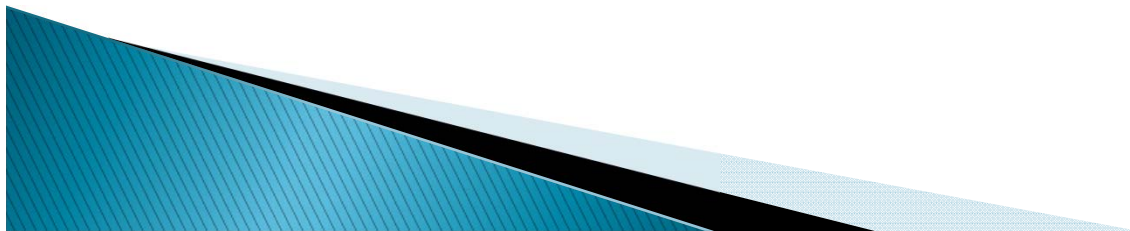
- The Federal Plan could be modified to address the comments submitted by community members.
 - The community comments could not be the basis of changes in the Federal Plan.
 - The plan could remain the same.
 - The communities could be approached by the state environmental agency to discuss the situations in the communities.
 - The power industry could engage the communities in working to address the community issues and concerns.
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What do rule-writers do with comments they receive?

- All comments are reviewed by the rule-writers.
- All information submitted is considered and compiled.
- Appropriate comments are identified for consideration in making changes to the plan.
- The rule-writers make recommendations to the EPA administration for consideration.

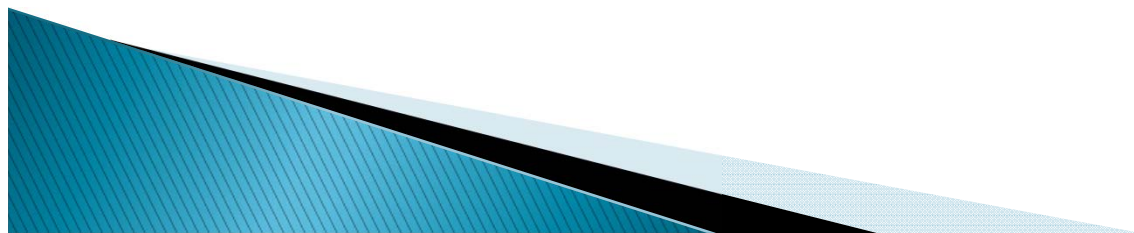


- The only way to have a positive impact on the Clean Power Plan is for communities to become involved and maintain that involvement over the long haul.
- Community involvement is critical to maintaining the community in a situation that makes living in the community tolerable.
- Remember if you are not involved in commenting on the plan, decisions that will impact your health and quality of life will be made for you, without your input.



What are other factors that can shape the rule-making process besides public comments?

- Meetings with the companies operating the power plants.
- In some cases portions of the plants are owned by municipalities.
- Attend local government meetings and provide input on the rule and the proposed Federal Plan on behalf of your communities.
- Contact and educate individual government representatives such as county commissioners and heads of county or municipal governments.



- Interact with other community members that have not been involved but are being impacted, such as church organizations, civic organizations, school board members and parents.
- Engage environmental organizations to support your issues.
- Use the track record of the power plant facility in your community, as well as facilities in your state, to back up your concerns.
- Gather support for your issues concerning the Clean Power Plan and improvements to your environmental situations and quality of life in your community.

